

**UNITED STATES DISTRICT COURT**  
WESTERN DISTRICT OF TEXAS, DEL RIO DIVISION

United States of America

vs.

(1) Shayan Heidari-Havadaragh

§  
§  
§  
§  
§

CRIMINAL COMPLAINT

CASE NUMBER: DR:24-M -03653(1)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about **November 29, 2024** in **Maverick** county, in the **WESTERN DISTRICT OF TEXAS** defendant(s) did, an alien, did knowingly and willfully enter the United States at a time and place other than as designated by Immigration Officers for entry into the United States, a misdemeanor,

in violation of Title

**8**

United States Code, Section(s)

**1325(a)(1)**

I further state that I am a(n) **Border Patrol Agent, KETTLE-MARCH, JAVAIR** and that this complaint is based on the following facts: *"On or about November 29, 2024 the defendant, HEIDARI-HAVADARAGH, SHAYAN, an alien who is a native and citizen of Iran, entered the United States illegally from the Republic of Mexico by crossing the Rio Grande River at a time and place other than as designated by Immigration Officers near Eagle Pass, Texas."*

Sworn to before me and subscribed in my presence,

/s/ KETTLE-MARCH, JAVAIR

Signature of Complainant

KETTLE-MARCH, JAVAIR

Border Patrol Agent

12/09/2024

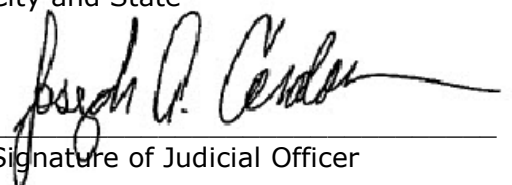
File Date

at DEL RIO, Texas

City and State

JOSEPH A CORDOVA

UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer